

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

HUMAN RIGHTS DEFENSE CENTER,

Plaintiff,

VS.

GRAYSON COUNTY, TEXAS; and TOM
WATT, individually and in his official
capacity as Sheriff of Grayson County,

Defendants.

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CIVIL ACTION NO. 4:24-cv-00828-ALM

**SUPPLEMENT TO [CORRECTED] DEFENDANTS GRAYSON COUNTY, TEXAS' AND
SHERIFF TOM WATT'S RESPONSE TO PLAINTIFF'S APPLICATION FOR A
PRELIMINARY INJUNCTION [DKT. 17]**

TO THE HONORABLE JUDGE OF SAID COURT:

Come now Grayson County, Texas, and Tom Watt, individually and in his official capacity as Sheriff of Grayson County, Defendants herein. Pursuant to the Court's instructions, Defendants provide the following supplement to [Corrected] Defendants Grayson County, Texas' and Sheriff Tom Watt's Response to Plaintiff's Application for a Preliminary Injunction [Dkt. 17]:

1. The Grayson County jail continues their efforts to update policy and procedures. As previously presented in the prior supplement, the appeal process was clarified with an expanded form and process. At the hearing there was a question over the interpretation of the appeal period. No appeal has been denied based on timelines. However, if there are issues created by the mail timing and confusion over the wording, Grayson County jail is willing to adjust its policy. The recent hearing was the first time that issue was known.

2. Likewise, as noted below, this issue with Plaintiff is an issue that appears unique to Plaintiff at the current time. Again, Grayson County jail is willing to review issues and adjust its policy accordingly. Below are the answers to the questions posed by the Court for further response. In addition, this supplement is to further advise the Court and Plaintiff of the continued review of these matters. The intent is seek a resolution of these matters in a way that does not use unnecessary Court time and attention.

3. Defendant Grayson County is hereby advising the Court and Plaintiff that Grayson County jail will adjust its procedures and policies to comply with the following.

1. Allow any HRDC publication sent to the county jail to be delivered to the intended inmate, said delivery subject only to policy and procedures related to content bans. (Jail staff will remove staples.)
2. Provide HRDC notice and reasons for any rejection or denial. (The Court has previously been provided with the MAP form which will continue in use. It will be updated to change the appeal timetable as noted below.)
3. Provide an appeal period of 30 calendar days for an appeal.
4. Provide HRDC an opportunity to examine materials relied upon in making the rejection.
5. Provide HRDC a written explanation to any appeal within 10 business days of that decision.

4. Defendants further provide the responses to the Court's inquiries below.

Has the Grayson County jail rejected other publications? Based upon its investigation, Grayson County jail has not received other similar items with staples. Thus, the answer is: No.

Do scanned items have a termination date? Yes. 14 days. The items are not terminated, just not accessible to the inmates after the 14 days while the inmates are still in jail.

5. Defendants further confirm the statement at the hearing that the address for the jail administration is on the current web page:

To contact Jail Administration email DetAdmin@co.grayson.tx.us

6. As noted in the email of November 7, 2024, the undersigned urges Plaintiff to alert me if there is any future issue so we can review any alleged failure of the system. The jail administration can also be contacted directly.

Respectfully submitted,

By: /s/ James C. Tidwell

James C. Tidwell

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ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a Notice of Electronic Filing to the Plaintiff's attorneys of record registered with the Court.

Dated: January 31, 2025

/s/ James C. Tidwell

James C. Tidwell